

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DIANE BOND,)	
)	
Plaintiff)	
)	
v.)	
)	
CHICAGO POLICE OFFICERS EDWIN)	
UTRERAS (Star No. 19901), ANDREW)	No. 04 C 2617
SCHOEFF (Star No. 4436), CHRIST)	
SAVICKAS (Star No. 5991), ROBERT)	Judge Joan Humphrey Lefkow
STEGMILLER (Star No. 18764), JOSEPH)	
SEINITZ (Star No. 4947), ROBERT SHULTZ)	Magistrate Judge Ashman
(Star No. 13882), NICHOLAS CORTESI (Star)	
No. 15112), JOHN CANNON (Star No.)	
12241), and JOHN DOES ONE through FIVE,)	
in their individual capacities; and the CITY OF)	
CHICAGO,)	
)	
Defendants.)	
)	
)	

**PLAINTIFF'S FIRST REQUEST TO PRODUCE
DOCUMENTS TO DEFENDANT CITY OF CHICAGO**

Plaintiff, by and through her attorney, Craig B. Futterman, and pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby requests that the Defendant CITY OF CHICAGO, produce the following documents, objects, and tangible things within thirty days upon receipt of this request at the office of Craig B. Futterman, EDWIN F. MANDEL LEGAL AID CLINIC, 6020 South University, Chicago, IL 60637.

DEFINITIONS

As used herein, the below-listed terms shall have the following meanings unless otherwise specified or unless otherwise required by the context in which the term is used.

A. "Plaintiff" means Diane Bond.

15. Any and all documents relating to any awards, commendations, or promotions received by the Individual Police Defendants.
16. Any and all records providing information as to whether any of the Individual Police Defendants have ever fired their guns while employed by the Chicago Police Department (excluding target practice and training exercises).
17. Any and all documents (including use of force and tactical response reports) related to instances in which any of the Individual Police Defendants used force as a part of his job as a Chicago police officer.
18. For the years 2003 through the present, any and all arrest reports, case reports, and field contact cards in which any of the Individual Police Defendants were listed as a reporting or assisting officer.
19. Any and all records of any disciplinary complaints and investigations (including Summary Punishment), whether or not acted upon formally or informally, including the entire Complaint Register files (O.P.S. and I.A.D. records), records indicating any sexual harassment caused by the Individual Police Defendants, disciplinary histories and summaries for each of the Individual Police Defendants at any time during his employment with the Chicago Police Department. For each such complaint, please also produce any and all documents relating to investigative and disciplinary recommendations, the review of the investigator's recommendations (including but not limited to review by supervisory personnel of O.P.S. or I.A.D., command channel review, review by the Superintendent, Police Board, and Complaint Review Panel), any administrative or judicial proceedings

related to the complaint (including but not limited to proceedings before the complaint review panel, Police Board, arbitrator, or judicial or administrative officer), and any official or unofficial action taken.

20. For each of the years 1999 through 2004, any and all documents containing information related to the number of excessive force complaints filed against Chicago police officers, the number and percentages of excessive force complaints that were sustained, and the number of excessive force complaints that resulted in the imposition of a disciplinary sanction of a suspension for longer than a week or termination.
21. For each of the years 1999 through 2004, any and all documents containing information related to the number of illegal search complaints filed against Chicago police officers, the number and percentages of illegal search complaints that were sustained, and the number of illegal search complaints that resulted in the imposition of a disciplinary sanction of a suspension for longer than a week or termination.
22. For each of the years 1999 through 2004, any and all documents containing information related to the number of strip search complaints filed against Chicago police officers, the number and percentages of strip search complaints that were sustained, and the number of strip search complaints that resulted in the imposition of a disciplinary sanction of a suspension for longer than a week or termination.
23. For each of the years 1999 through 2004, any and all documents containing information related to the number of sexual abuse or harassment complaints

45. The daily activity reports, supervisor management logs or any other report that documents or summarizes the daily activity of all police personnel assigned or detailed to Public Housing Units 715 or 715B, who were assigned to work at any time between 4 p.m. and midnight on:
- A. April 13, 2003;
 - B. April 19, 2003;
 - C. April 28, 2003;
 - D. April 30, 2003;
 - E. March 29, 2004;
 - F. March 30, 2004;
 - G. April 7, 2004;
 - H. May 3, 2004; and
 - I. April 25, 2000.
46. Any and all documents that provide any information about the whereabouts and activities of the Individual Police Defendants between 4 p.m. and midnight on:
- A. April 13, 2003;
 - B. April 19, 2003;
 - C. April 28, 2003;
 - D. April 30, 2003;
 - E. March 29, 2004;
 - F. March 30, 2004;
 - G. April 7, 2004;

H. May 3, 2004; and

I. April 25, 2000.

47. Any and all Watch Commander and Watch Secretary logs in Public Housing

Units 715 or 715B for the 3rd Watch on the following days:

A. April 13, 2003;

B. April 19, 2003;

C. April 28, 2003;

D. April 30, 2003;

E. March 29, 2004;

F. March 30, 2004;

G. April 7, 2004;

H. May 3, 2004; and

I. April 25, 2000.

48. Any and all documents providing information as or related to the vehicles

(including but not limited to the make, model, color, license plate number, and name of officer to whom the car was assigned) which were assigned to police officers assigned or detailed to Public Housing Units 715 or 715B at any time between 4 p.m. and midnight or in the 3rd or 6th Watch on:

A. April 13, 2003;

B. April 19, 2003;

C. April 28, 2003;

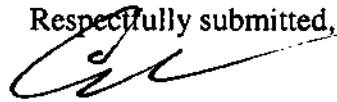
D. April 30, 2003;

E. March 29, 2004;

understand when force is and is not appropriate.” (See attached letter from Mayor Daley, Jan. 18, 2002.)

72. Any and all documents related to what Mayor Daley in June 2002 referred to as the Chicago Police Department’s “overhaul” of the Office of Professional Standards. (See attached letter from Mayor Daley, Jan. 18, 2002.)

Respectfully submitted,



One of Plaintiff’s Attorneys

Date: October 8, 2004

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